

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

SCOTT TURNAGE, CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON, ISSACCA
POWELL, KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN and KIMBERLY ALLEN
on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former
Sheriff of Shelby County, Tennessee; FLOYD BONNER,
JR., in his official capacity as the Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual capacity
as former Jail Director of Shelby County, Tennessee;
KIRK FIELDS, in his official capacity as the Jail Director
of Shelby County, Tennessee; CHARLENE MCGHEE, in
her individual capacity as former Assistant Chief of Jail
Security of Shelby County, Tennessee; REGINALD
HUBBARD, in his official capacity as Assistant Chief of
Jail Security of Shelby County, Tennessee; DEBRA
HAMMONS, in her individual capacity as former Assistant
Chief of Jail Programs; TIFFANY WARD in her official
capacity as the Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY, TENNESSEE,
a Tennessee municipality; TYLER TECHNOLOGIES,
INC., a foreign corporation; GLOBAL TEL*LINK
CORPORATION, a foreign corporation; SOFTWARE
AG USA, INC., a foreign corporation; SIERRA-CEDAR,
INC., a foreign corporation; SIERRA SYSTEMS GROUP,
INC., a foreign corporation, and TETRUS CORP, a foreign
Corporation,

Defendants.

Civil Action No. 2:16-cv-02907-
SHM-tmp

Jury Demanded

NOTICE TO TAKE THE DEPOSITION OF CORTEZ D. BROWN

TO: **Cortez D. Brown**

c/o Frank L. Watson
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Pursuant to Federal Rule of Civil Procedure 30(a)(1), Defendants Shelby County, Tennessee, Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Floyd Bonner, Jr., Kirk Fields, Reginald Hubbard, Tiffany Ward (collectively “Shelby County Defendants”), Tyler Technologies, Inc., Global Tel*Link Corporation, Software AG USA, Inc., Sierra-Cedar, Inc., Sierra Systems Group, Inc., and Tetras Corp. will take the deposition of **Cortez D. Brown at Wyatt, Tarrant & Combs, LLP, 6070 Poplar, Suite 300, Memphis, TN 38119 on Tuesday, January 28, 2020 at 1:00 p.m. (CST)** and continuing until such time as completed.

The testimony shall be recorded by a certified court reporter by stenographic, audio, electronic and/or other means. The deposition may be recorded by video or other visual and electronic means. The deposition shall be taken before a notary public or other officer authorized by law to administer oaths.

The deposition is for class certification discovery. It may be used as evidence and for all other purposes authorized by law.

Respectfully submitted,

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*Counsel for Defendants Shelby County, Tennessee,
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Reginald Hubbard and Tiffany Ward*

CERTIFICATE OF SERVICE

I certify that the foregoing is being filed via the Court's ECF system this 6th day of December, 2019, for service on all persons registered in connection with this case, including:

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/s/ Odell Horton, Jr.